

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS**

**TIMOTHY TRIGG  
ANGELA TRIGG**

**PLAINTIFFS**

**VERSUS**

**CIVIL ACTION NO. 2:18-cv-00007**

**PLATINUM LEVEL TRANSPORT, INC.;  
ENTIMO E. CORADO MERIDA  
and JOHN DOES 1-5**

**DEFENDANTS**

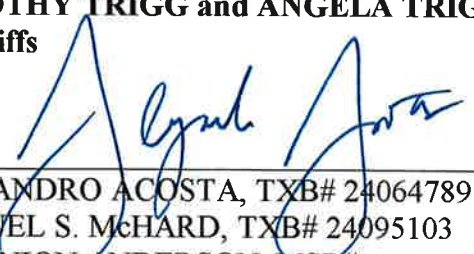
---

**PLAINTIFFS' MOTION TO TRANSFER VENUE**

---

Plaintiffs Timothy Trigg and Angela Trigg respectfully move the Court to transfer this case to the El Paso Division in the Western District of Texas. Venue cannot properly be laid in the Del Rio Division of the Western District of Texas under 28 U.S.C. § 1391(b)(1) because no party to this case resides in this Division, and venue is improper here under 28 U.S.C. § 1391(b)(2) because no substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in this Division. Therefore, pursuant to 28 U.S.C § 1406(a), the Court may either dismiss this action or transfer it in the interest of justice to a division in which it could have been brought. Plaintiff requests that the Court transfer the action to the El Paso Division of the Western District of Texas, in which a substantial part of the events or omissions giving rise to the claim occurred (U.S.C.A § 1391(b)(2)). Civil Action No. **2:18-cv-00007** Document 1 Filed 02/02/18 is appended hereto.

**TIMOTHY TRIGG and ANGELA TRIGG,  
Plaintiffs**



---

ALEJANDRO ACOSTA, TXB# 24064789  
SAMUEL S. McHARD, TXB# 24095103  
P. MANION ANDERSON, MSB# 104250, *Pro hac vice* pending  
CORY N. FERRAEZ, MSB# 104770, *Pro hac vice* pending

ALEJANDRO ACOSTA, TXB# 24064789  
FLORES, TAWNEY & ACOSTA, P.C.  
801 Myrtle Ave, Suite 100  
El Paso, TX 79901  
Ph: (915)308-1000  
Fx: (915)300-0283  
Em: [aacosta@ftalawfirm.com](mailto:aacosta@ftalawfirm.com)

SAMUEL S. McHARD, TXB# 24095103  
P. MANION ANDERSON, MSB# 104250, *Pro hac vice* pending  
CORY N. FERRAEZ, MSB# 104770, *Pro hac vice* pending  
McHARD, McHARD, ANDERSON  
& ASSOCIATES, PLLC  
140 Mayfair Road, Suite 1500  
Hattiesburg, MS 39402  
Ph: (601) 450-1715  
Fx: (601) 451-1719  
Em: [smchard@mchardlaw.com](mailto:smchard@mchardlaw.com)  
[manderson@mchardlaw.com](mailto:manderson@mchardlaw.com)  
[cferraez@mchardlaw.com](mailto:cferraez@mchardlaw.com)